

Examiner: Jack M. Choules
Art Unit: 2177

REMARKS

Claims 1 and 2 are rejected under 35 USC 102(b) as being anticipated by Mitchell et al. (U.S. Patent 5,872,973). Claim 3 is rejected under 35 USC 103(a) as being unpatentable over Mitchell et al. Applicant has amended the claims to more clearly define the present invention. Applicant respectfully submits that the claims of the present invention as amended are neither taught nor suggested by the cited prior art.

More particularly, independent claim 1 recites, *inter alia*,

"... a second graphical user interface adapted to **enable a user to input arbitrary text to define and store bidirectional text describing relations between related data objects, said bidirectional text corresponding to a given pair of related data objects O₁ and O₂ including first text that characterizes semantics of a relationship of object O₁ to O₂ and second text that characterizes semantics of a relationship of object O₂ to O₁.**"

Nowhere does Mitchell et al. teach or suggest this feature.

The Examiner seems to point to the pane 404 of Fig. 4 as providing these features. Pane 404 lists links between objects that dynamically synchronize one or members (attributes, fields, functions, and properties) of one class to one or more members of another class. Col. 7, lines 45-57 of Mitchell et al. It specifically identifies the member(s) of the two classes that are dynamically synchronized. This information is part

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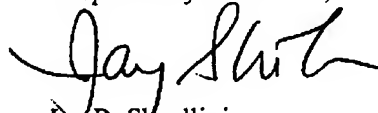
of the objects themselves. Importantly, the information in pane 404 is not text that characterizes the semantics of a relationship from one object to another as recited in the claim. It is also not defined by user input of arbitrary text as recited in the claims. Because there are significant differences between claim 1 as amended and the cited prior art, Applicant respectfully asserts that amended claim 1 is patentable over the cited prior art.

Dependent claims 2 and 3 are patentable over the cited prior art for those reasons advanced above with respect to claim 1 from which they respectfully depend and for reciting additional features neither taught nor suggested by the cited prior art. For example, claim 3 recites "said third graphical user interface is adapted to identify related data objects and **display** relevant parts of said bidirectional text with respect to related data objects in conjunction with **visual indicia representing the related data objects.**" Nowhere does Mitchell et al. teach or suggest these features. The Examiner seems to point to Fig. 1 of Mitchell et al. as teaching these features. However, Fig. 1 is a schematic diagram. It is not a graphical user interface. Moreover, the schematic diagram of Fig. 1 fails to show "visual indicia representing related data objects." The Examiner has also failed to point to where Fig. 1 shows this element. Finally, Fig. 1 fails to teach or suggest the "display" of relevant parts of bidirectional text in conjunction with such visual indicia as recited in the claim.

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In light of all of the above, it is submitted that the claims are in order for allowance, and prompt allowance is earnestly requested. Should any issues remain outstanding, the Examiner is invited to call the undersigned attorney of record so that the case may proceed expeditiously to allowance.

Respectfully submitted,



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